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May 14, 2015

Frankie Hampton, Paralegal
Federal Election Commission
Office of Complaints Examination and Legal Administration
999 E Street, NW
Washington, DC 20436

Re: Response to Complaint, MUR 6924


Dear Ms. Hampton:

On behalf of Andrew Winer, this letter responds to the complaint received by the Federal Election Commission ("FEC") on March 17, 2015 from former Hawaii Governor Benjamin Cayetano. Mr. Winer wishes to incorporate in its entirety the response of Pacific Resource Partnership ("PRP") that was filed on May 1, 2015, which is attached as Exhibit A. For the reasons set forth in the PRP response – namely, the complaint's failure to allege facts that show any violation of the law – the complaint should be dismissed with respect to Mr. Winer as well.

Additionally, even if the FEC were to find – incorrectly – that a coordination communication did occur, the FEC has no basis to find a violation against Mr. Winer. The only legal consequence of a coordinated communication is that it results in a contribution. But, as a vendor, Mr. Winer cannot be found to have made or received such a contribution – and, accordingly, there is no legal basis to pursue a claim against him.

The FEC should dismiss the complaint and close the file.

Very truly yours,


Marc E. Elias
Jonathan S. Berkon
Rachel L. Jacobs


William Moheula

Counsel to Andrew Winer

Enclosures

BOOKS

May 1, 2015

Marc Erik Elias
MElias@perkinscoie.com
D (202) 434-1609
F (202) 654-9126

Frankie Hampton, Paralegal
Federal Election Commission
Office of Complaints Examination and Legal Administration
999 E Street, NW
Washington, DC 20436

Re: Response to Complaint, MUR 6924

Dear Ms. Hampton:

On behalf of Pacific Resource Partnership ("PRP"), and John White in his official capacity as treasurer (collectively, "Respondents"), this letter responds to the complaint received by the Federal Election Commission ("FEC") on March 17, 2015.

For more than two years, former Hawaii Governor Benjamin Cayetano has filed lawsuits and complaints against PRP and other individuals who worked for PRP during the 2012 election cycle. The dispute stems from PRP's successful independent expenditure campaign opposing Mr. Cayetano's bid for Honolulu Mayor in 2012. Having exhausted his stock of complaints to file with the Hawaii Campaign Spending Commission, Mr. Cayetano is now seeking to invoke the FEC's jurisdiction to prolong a fight that the voters of Honolulu resolved at the ballot box in 2012. The FEC should reject Mr. Cayetano's entreaty.

Mr. Cayetano's latest jeremiad is larded with allegations that Respondents violated state campaign finance law – which, of course, is beyond the FEC's jurisdiction. Mr. Cayetano then suggests that certain communications distributed by PRP in support of Kirk Caldwell, Mr. Cayetano's opponent in the Honolulu mayoral race in 2012, were "coordinated communications" with Mazie Hirono and/or the Hawaii Democratic Party ("HDP"). But Mr. Cayetano does not allege facts that, if proven true, would constitute a valid coordination claim under federal law. Specifically, Mr. Cayetano fails to marshal any evidence that Andrew Winer, the vendor who had separate consulting engagements with PRP and the HDP, used or conveyed any material information from HDP in his work for PRP. Mr. Winer, in fact, specifically denies that he did so. That is unsurprising: the work that Mr. Winer did for HDP was unrelated and immaterial to the work that he did for PRP.

Because the complaint does not allege facts that, if proven true, would constitute a violation of the Federal Election Campaign Act (the "Act") or FEC regulations, the FEC should dismiss the complaint and close the file.

BACKGROUND

During the 2012 election cycle, PRP employed Mr. Winer as a consultant.¹ Mr. Winer performed a variety of services for PRP. Though he was not paid to create or produce any public communications, Mr. Winer helped PRP develop its messaging in an independent expenditure campaign supporting Honolulu mayoral candidate Mr. Caldwell and opposing Mr. Cayetano.² Although the mayoral race was nonpartisan, both Mr. Caldwell and Mr. Cayetano had previously run for public office as Democrats and were running in a heavily-Democratic jurisdiction. The key swing vote, therefore, were registered Democrats who (based on voting history) were nearly certain to cast ballots in the race. Mr. Winer was part of the team that developed a strategy to persuade these frequent-voting Democrats to support Mr. Caldwell. The strategy included a series of communications contrasting Mr. Caldwell with Mr. Cayetano who, in PRP's opinion, did not reflect the mainstream of the Democratic Party on the crucial questions of infrastructure and economic development.

As part of this series of communications, PRP distributed a door hanger and sent some mailers urging support for the "Democratic team" and featuring images of President Obama, then-Congresswoman (and now Senator) Hirono, and Mr. Caldwell.³ The sole purpose of the mailers and door hanger was to persuade frequent-voting Democrats – whose support for President Obama and then-Congresswoman Hirono was not in doubt – to back Mr. Caldwell over Mr. Cayetano. PRP was attempting to leverage the popularity of President Obama and then-Congresswoman Hirono among these targeted voters to propel Mr. Caldwell to victory. PRP had no need to, or interest in, generating additional votes for President Obama and then-Congresswoman Hirono. Nonetheless, out of an abundance of caution, PRP filed independent expenditure reports with the FEC disclosing these communications.

Months after he began consulting for PRP, Mr. Winer was retained by the HDP to manage the party's coordinated campaign effort.⁴ Contrary to Mr. Cayetano's assertion, Mr. Winer did not "represent" then-Congresswoman Hirono in the coordinated campaign. Mr. Winer was retained by the HDP to coordinate efforts among *all* Democratic candidates running in 2012. His work for PRP and the HDP were unrelated. Neither the HDP nor Senator Hirono endorsed a candidate in the mayoral race. And in contrast to his work for PRP, which focused on persuading *frequent* voters to support Mr. Caldwell in a nonpartisan race, Mr. Winer's work for HDP focused on turning out *infrequent* voters to support Democratic candidates in partisan races:

Democrats identified about 70,000 infrequent voters statewide who would likely be open to voting for Hirono. Andy Winer, a Democratic strategist, said these voters received multiple mailers and telephone calls. Thousands also received personal visits by activists

¹ See Declaration of Andrew Winer ¶ 3 (May 1, 2015), ("Winer Decl."), attached hereto as Attachment A.

² See *id.*

³ See Attachment B.

⁴ See Winer Decl. ¶ 2.

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at their homes. "We pushed them pretty hard. We really went hard after the infrequent voting Democrats," he said. "This particular effort was probably the most coordinated and focused get-out-the-vote campaign that [the HDP has] ever had."⁵

Mr. Winer attests that he did not use information about the plans, projects, activities, or needs of the HDP or information used previously in providing services to the HDP in his work for PRP.⁶ Nor, he attests, did he convey such information to PRP.⁷ Moreover, any information that Mr. Winer learned in his work for HDP would not have been material to PRP's communications, as the two entities' programs were unrelated.⁸

During the relevant period, Mr. Winer also volunteered his services to Friends of Mazie Hirono; he was not compensated.⁹ His work focused primarily on debate preparation.¹⁰ In this role, Mr. Winer did not have actual authority, express or implied, to engage in any of the activities described in 11 C.F.R. § 109.3(b).¹¹ Like his work for the HDP, Mr. Winer's volunteer work for Friends of Mazie Hirono was unrelated to his work for PRP.¹² Mr. Winer did not use information about the plans, projects, activities, or needs of Friends of Mazie Hirono, or information used previously in providing services to Friends of Mazie Hirono, in his work for PRP.¹³ Nor did he convey such information to PRP.¹⁴ Any information that Mr. Winer learned in his work for Friends of Mazie Hirono would not have been material to PRP's communications.¹⁵

LEGAL DISCUSSION

The Commission may find "reason to believe" that a violation has occurred only "if a complaint sets forth sufficient facts, which, if proven true, would constitute a violation of the [Act]."¹⁶ This complaint fails to marshal facts that, if proven true, would establish a coordinated communication between PRP and the HDP and/or PRP and Friends of Mazie Hirono. Mr.

⁵ Derrick DePledge, *Hirono Rout Casts Doubt on Lingle's Viability*, HONOLULU STAR-ADVERTISER (Nov. 8, 2012), available at http://www.staradvertiser.com/electionspremium/2012/20121108_Hirono_rout_casts_doubt_on_Lingles_viability.html.

⁶ Winer Decl. ¶ 5.

⁷ *Id.* ¶ 6.

⁸ *See id.* ¶¶ 5-6.

⁹ *Id.* ¶ 7.

¹⁰ *Id.* ¶ 9.

¹¹ *Id.* ¶ 8.

¹² *Id.* ¶ 9.

¹³ *Id.* ¶ 10.

¹⁴ *Id.* ¶ 11.

¹⁵ *Id.* ¶¶ 10-11.

¹⁶ Statement of Reasons of Comm'rs David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas, MUR 4960 (Dec. 21, 2000).

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Cayetano contends that "an investigation would support the finding that 11 C.F.R. § 109-1, et seq. was violated in the three conditions of what is a coordinated communication."¹⁷ But the law "does not permit a complainant to present mere allegations that the Act has been violated and request that the Commission undertake an investigation to determine whether there are facts to support these charges."¹⁸ And, as we explain below, the facts before the Commission establish that no coordinated communication took place.

I. The Conduct Prong Was Not Met

A "coordinated communication" occurs only where three prongs are met.¹⁹ First, the public communication must be paid for by a person other than the candidate, authorized committee, or political party committee with which it was coordinated. Second, it must satisfy one or more content standards. Third, it must satisfy one of the prescribed conduct standards. Here, the conduct prong was not satisfied between the HDP and PRP or between Friends of Mazie Hirono and PRP.

A. PRP and the HDP

Mr. Cayetano suggests that PRP and the HDP shared a "common vendor" and thereby satisfied the "conduct prong." This is incorrect as a matter of law. The "common vendor" prong is *not* satisfied merely because a party committee and third party group use the same consultant. It is met only where the shared vendor "uses or conveys to the person paying for the communication: (A) [i]nformation about the campaign plans, projects, activities, or needs of the clearly identified candidate, the candidate's opponent, or a political party committee, and that information is material to the creation, production, or distribution of the communication; or (B) [i]nformation used previously by the commercial vendor in providing services to the candidate who is clearly identified in the communication, or the candidate's authorized committee, the candidate's opponent, the opponent's authorized committee, or a political party committee, and that information is material to the creation, production, or distribution of the communication."²⁰ The Commission has underscored that "vendors who provide one or more of the specified services are not in any way prohibited from providing services to both candidates or political party committees and third-party spenders" and that the Commission "does not presume coordination from the mere presence of a common vendor."²¹

¹⁷ Compl. at 5.

¹⁸ Statement of Reasons of Vice Chairman Matthew S. Petersen and Comm'rs Caroline C. Hunter and Donald F. McGahn, MUR 6056, at 6 n.12 (June 2, 2009).

¹⁹ 11 C.F.R. § 109.21(a).

²⁰ *Id.* § 109.21(d)(4)(iii).

²¹ See *Coordinated and Indep. Expenditures*, 68 Fed. Reg. 421, 436-37 (Jan. 3, 2003); see also First General Counsel's Report, MUR 6050, at 9 (Jan. 23, 2009).

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Instead, the "regulation focuses on the sharing of information about plans, projects, activities, or needs of a candidate or political party through a common vendor to the spender who pays for a communication that could not then be considered to be made 'totally independently' from the candidate or political party committee."²² Mr. Cayetano's complaint does not allege that Mr. Winer used or shared such information. Indeed, Mr. Winer specifically denies that he did so. In the absence of any evidence to the contrary, the Commission simply cannot find that the "common vendor" test was met.

Nor are any of the other conduct standards met. The "substantial discussion" standard is not met because the HDP's plans, projects, activities, or needs were not conveyed to PRP and, in any event, were not material to any of the PRP communications at issue here. The "request or suggestion" and "material involvement" standards are not met because Mr. Winer was not acting as the HDP's "agent" in his work for PRP. The Commission has stated unequivocally that "a person would only qualify as an 'agent' when he or she ... engages in those activities *on behalf of that specific principal*."²³ Conversely, a "principal would not assume 'liability' for agents who act outside the scope of their actual authority, nor would a person be considered an 'agent' of a candidate if that person approaches an outside spender on behalf of a different organization or person."²⁴ Mr. Winer was not acting as the HDP's agent while performing work for PRP. This was not a circumstance where Mr. Winer took on the PRP work to advance the HDP's political goals. To the contrary, Mr. Winer's consultancy for PRP long pre-dated his consultancy with the HDP and the HDP had not even endorsed a candidate in the Honolulu mayoral race. The fact that Mr. Winer did not discuss PRP's door hanger or mailers with the HDP prior to distribution shows the lack of any connection between the two consultancies.²⁵ There is simply no evidence that any of Mr. Winer's work for PRP was undertaken on behalf of, or on the authority of, the HDP.

Accordingly, none of the conduct standards are met to establish a coordinated communication between the HDP and PRP.

B. PRP and Friends of Mazie Hirono

Mr. Winer was not a "common vendor" between Friends of Mazie Hirono and PRP. To be a "common vendor" between two entities, one must serve as a "commercial vendor" to both entities.²⁶ A "commercial vendor" means any persons providing goods or services to a candidate or political committee whose usual and normal business involves the sale, rental, lease or

²² *Coordinated and Indep. Expenditures*, 68 Fed. Reg. at 436.

²³ *Coordinated and Indep. Expenditures*, 68 Fed. Reg. at 424 (emphasis added).

²⁴ *Id.*

²⁵ See Winer Decl. ¶ 12.

²⁶ 11 C.F.R. § 109.21(d)(4)(i)-(ii).

provision of those goods or services.²⁷ Mr. Winer was an uncompensated volunteer for Friends of Mazie Hirono and therefore was not acting as a "commercial vendor."²⁸

Even if Mr. Winer were paid by Friends of Mazie Hirono to provide consulting services, the "common vendor" prong still would not have been satisfied because Mr. Winer did not use in his work for PRP, or convey to PRP, information about the plans, projects, activities, or needs of Friends of Mazie Hirono or information used previously in providing services to Friends of Mazie Hirono. As explained in the preceding section, such information would not have been material to PRP's communications anyhow.

The other conduct standards are not met because Mr. Winer was not an "agent" of Friends of Mazie Hirono. A person is an "agent" of a candidate only where he "[r]eceives actual authorization, either express or implied, from a specific principal to engage in the specific activities listed in [section] 109.3."²⁹ As Mr. Winer attests in his declaration, he received no such authority from Friends of Mazie Hirono. His role with the campaign was primarily limited to assisting with debate preparation; that simply does not rise to the level of being an "agent" of the campaign for purposes of the coordination rules. But even if Mr. Winer were an "agent" of the campaign, his work for PRP was not undertaken on behalf, or on the authority, of the campaign. As noted earlier, then-Congresswoman Hirono did not endorse a candidate in the Honolulu mayoral race and Mr. Winer's work for PRP long pre-dated his volunteer activity for the campaign in the general election.

Accordingly, none of the conduct standards are met to establish a coordinated communication between Friends of Mazie Hirono and PRP.

II. PRP's Communications Were Not Intended to Influence Any Federal Elections

Mr. Cayetano's failure to establish that any of the conduct standards were met compels the Commission to dismiss this complaint. But independent from that, the Commission has another policy-based reason to reject a "reason to believe" finding: the communications at issue were not intended to influence any federal election.

In various contexts, the Commission has recognized that there is a need to exercise caution when regulating communications that refer to federal candidates but otherwise exhibit no intent to influence a federal election. For example, there is a safe harbor under the coordinated communications regulation for endorsements and solicitations by federal candidates of nonfederal candidates.³⁰ Additionally, in a comparable matter, the Commission did not find reason to believe that the campaign committee of Kirby Hollingsworth, a candidate for the Texas

²⁷ *Id.* §§ 109.21(d)(4)(i), 116.1(c).

²⁸ Winer Decl. ¶¶ 7, 9.

²⁹ *Coordinated and Indep. Expenditures*, 68 Fed. Reg. at 424.

³⁰ 11 C.F.R. § 109.21(g).

House of Representatives, violated federal law when he sent a mailer and produced a radio advertisement that tied himself to the McCain-Palin ticket and staked out opposition to then-Senator Obama's presidential candidacy.³¹ Mr. Hollingsworth employed a strategy similar to PRP's in 2012: "[i]n an effort to boost his chances of winning, Hollingsworth attempted to capitalize on the broad for McCain/Palin in [his] district, and on then-Senator Obama's relative unpopularity in his district."³² Mr. Hollingsworth sent a mail piece and produced a radio advertisement "associating himself with the positions taken by McCain/Palin, while linking his opponent to Obama's policies."³³ The three commissioners opposing a "reason to believe" finding concluded that "it does not appear that the law was intended to reach the type of ads at issue in" that matter and that the advertisements "attempted to link Mr. Hollingsworth to John McCain in order to urge Mr. Hollingsworth's election, not vice versa."³⁴ When an advertisement is designed to influence a nonfederal election, and invokes federal candidates solely towards that aim, federal law should not apply.³⁵

That is exactly what happened here. PRP spent over \$3 million to elect Mr. Caldwell as mayor. Its entire focus during the 2012 (and 2014) election cycle was on state and local races in Hawaii. Setting aside the communications at issue here, PRP did not endorse any candidates for federal office during either cycle. PRP's sole interest in the federal races was how they could be utilized to move voters in the nonfederal race. As described in detail above, PRP determined that the swing vote in the nonpartisan mayoral election consisted of Democrats who were nearly certain to vote in the 2012 election. There was no doubt that these voters would support President Obama and then-Congresswoman Hirono at the top of the ticket; the only question was whom they would support in the mayoral election. Through its research, PRP determined that the best way to persuade these voters was to demonstrate that Mr. Caldwell was more faithful to Democratic Party principles than Mr. Cayetano. Part of that effort was to tie Mr. Caldwell to the two Democrats at the top of the ticket, by creating mailers and a door hanger that urged a vote for the "Democratic team."³⁶ Although the advertisements technically advocated for a vote for the two federal candidates, this was an attempt to link Mr. Caldwell to the two federal candidates to urge Mr. Caldwell's election, not vice versa.

For the reasons set forth above, the Commission should dismiss the complaint and close the file.

³¹ Statement of Reasons of Vice Chairman Matthew S. Petersen and Comm'rs Caroline C. Hunter and Donald F. McGahn, MUR 6113, at 3 (Dec. 18, 2009).

³² *Id.*

³³ *Id.*

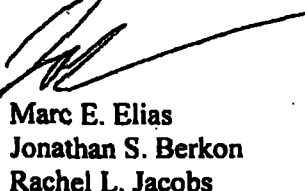
³⁴ *Id.*

³⁵ *See id.* at 4.

³⁶ Had these mailers and door hanger been sent by a party committee, they would not have been treated as "contributions" to the respective candidates. See 11 C.F.R. § 100.80 ("The payment by a State or local committee of a political party of the costs of preparation, display, or mailing or other distribution incurred by such committee with respect to a printed slate card ... or other printed listing(s) of three or more candidates for any public office for which an election is held in the [s]tate in which the committee is organized is not a contribution.").

May 1, 2015
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Very truly yours,



Marc E. Elias
Jonathan S. Berkon
Rachel L. Jacobs

Counsel to Pacific Resource Partnership and John White, in his official capacity as treasurer

ATTACHMENT A

BEFORE THE
FEDERAL ELECTION COMMISSION

IN RE

Pacific Resource Partnership

AND

John White, as Treasurer.

MUR 6924

DECLARATION OF ANDREW WINER

I, Andrew Winer, do declare and state as follows:

1. My name is Andrew Winer. Due to my employment and volunteer positions during the 2012 election, I am familiar with the matters discussed herein.
2. During the 2012 election, I served as a consultant for the Hawaii Democratic Party. I began work for the Hawaii Democratic Party after the primary election, which was held on August 11, 2012. In my capacity as a consultant, I supervised the GOTV effort by the Hawaii Democratic Party's coordinated campaign.
3. I also served as a consultant for Pacific Resource Partnership ("PRP") during the 2012 election. In my capacity as a consultant for PRP, I helped with message strategy related to Honolulu's nonpartisan mayoral election.
4. My work for the Hawaii Democratic Party's coordinated campaign was unrelated to my work for PRP.
5. Accordingly, in my work for PRP, I did not use information about the plans, projects, activities, or needs of the Hawaii Democratic Party or information used previously in

providing services to the Hawaii Democratic Party, nor would that information have been material to the PRP communications at issue in this matter.

6. Likewise, I did not convey to PRP or its agents the plans, projects, activities, or needs of the Hawaii Democratic Party or information used previously in providing services to the Hawaii Democratic Party, nor would that information have been material to the PRP communications at issue in this matter.

7. I also volunteered for now-Senator Mazie Hirono's campaign, Friends of Mazie Hirono, during the 2012 election. I did not receive any compensation for these services.

8. In my role as a volunteer to Friends of Mazie Hirono, I did not have actual authority, express or implied, to engage in any of the following activities on behalf of Mazie Hirono or her campaign:

- a. Request or suggest that a public communication be created, produced, or distributed;
- b. Make or authorize any public communications;
- c. Request or suggest that any other person create, produce, or distribute any public communication;
- d. Be materially involved in decisions regarding:
 - i. the content of any public communication;
 - ii. the intended audience for any public communication;
 - iii. the means or mode of any public communication;
 - iv. the specific media outlet used for any public communication;
 - v. the timing or frequency of any public communication; or

vi. the size or prominence of a printed communication, or duration of any public communication by means of broadcast, cable, or satellite;

- e. Provide material or information to assist another person in the creation, production, or distribution of any public communication;
- f. Make or direct any public communication that is created, produced, or distributed with the use of material or information derived from a substantial discussion about the public communication with a different candidate.

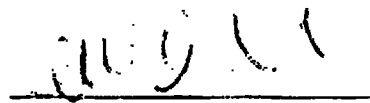
9. The volunteer work I did for Friends of Mazie Hirono – which, during the general election, mainly involved debate preparation – was unrelated to my work for PRP.

10. Accordingly, in my work for PRP, I did not use information about the plans, projects, activities, or needs of Friends of Mazie Hirono or information used previously in providing services to Friends of Mazie Hirono, nor would that information have been material to the PRP communications at issue in this matter.

11. Likewise, I did not convey to PRP or its agents the plans, projects, activities, or needs of Friends of Mazie Hirono or information used previously in providing services to Friends of Mazie Hirono, nor would that information have been material to the PRP communications at issue in this matter.

12. I did not tell any employee or agent of Friends of Mazie Hirono or the HDP about the PRP communications at issue in this matter prior to their being sent to voters by PRP.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 1 day of May, 2015.



Andrew Winer

ATTACHMENT B



Barack Obama



Mazie Hirono



Kirk Caldwell

On November 6, VOTE for the Democratic
team that will move Hawaii forward.



"President Obama, Mazie Hirono and Kirk Caldwell have my full support, because they are the strong Democrats that Hawaii's families and businesses need to succeed."

- Senator Daniel Inouye



"Kirk Caldwell is honest and trustworthy, and will move Hawaii forward."

-- Senator Inouye

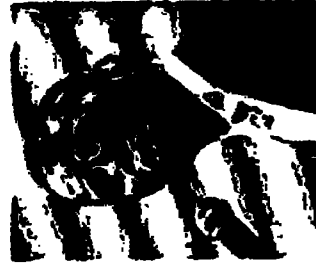
Born in Waipahu and raised in Hilo, Kirk Caldwell discovered at an early age the importance of public service. From working with Senator Inouye, to being a successful businessman, to proudly serving as acting mayor of Honolulu, Kirk has always worked to move Hawaii forward.

AS MAYOR, KIRK WILL:

- Expand Honolulu's community policing program and make our emergency services more efficient and effective
- Cut wasteful spending and help small businesses create the good-paying jobs we need
- Work to replace aging water and sewer systems without breaking the budget

**ON NOVEMBER 6, VOTE
THE DEMOCRATIC TEAM:**

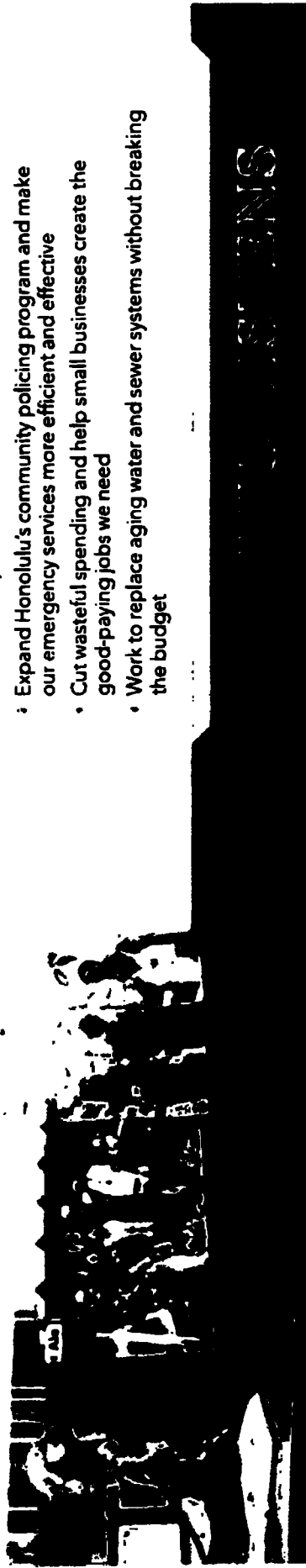
Barack Obama
For President



Mazie Hirono
For Senate



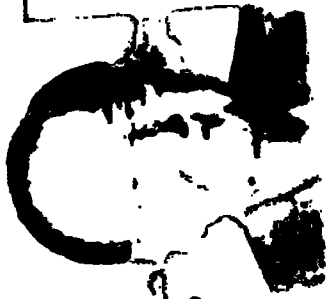
Kirk Caldwell
For Mayor



Pacific Resource Partnership PAC
Pacific Resource Partnership
1100 Alakea Street, 4th Floor
Honolulu, Hawaii 96813

NOTICE

Paid for by Pacific Resource Partnership PAC and Pacific Resource Partnership, 1100 Alakea Street,
4th Floor Honolulu, Hawaii 96813. Not authorized by any candidate or candidate committee.



**“I know Kirk Caldwell.
He’s honest and trusted.
That will never change.”**

— Senator Daniel K. Inouye



On November 6,
we can make Hawaii
a better place to raise a family
and start a business.

Vote the Hawaii Democratic Team



Barack Obama
PRESIDENT



Mazie Hirono
U.S. SENATE



Kirk Caldwell
MAYOR OF HONOLULU

President Obama,
Mazie Hirono and
Kirk Caldwell will
take on, and win,
the fights that
matter to us.

Vote for the Hawaii Democratic Team
VOTE on Tuesday, November 6

Paid for by Pacific Resource Partnership PAC and Pacific Resource Partnership, 1100 Alakea Street, 4th Floor, Honolulu, Hawaii 96813. Not authorized by any candidate or candidate committee.